

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

INTEREST RATE SWAPS ANTITRUST LITIGATION

This document Relates to All Actions

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16-MD-2704 (PAE)

**DECLARATION OF SETH ARD IN SUPPORT OF MOTION FOR ATTORNEY'S
FEEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

Pursuant to 28 U.S.C. § 1746, I, Seth Ard, declare as follows:

1. I am a partner in the law firm of Susman Godfrey LLP (“Susman Godfrey”). I have been actively involved in prosecuting and resolving this Action, am familiar with its proceedings, and have personal knowledge of the matters set forth herein.

2. Attached as Exhibit A is a schedule indicating the amount of expenses incurred by Susman Godfrey in connection with this action from inception through April 9, 2025.

These expenses are all reflected on the books and records of Susman Godfrey. To avoid double counting, Susman Godfrey’s contributions to the common litigation fund are not included in Exhibit A. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. None of the expenses were incurred in connection with the application for attorneys’ fees and expenses.

3. The “document creation and reproduction” expense category includes such costs as those for court reporters and videographers, as well as copying costs, binding costs, document scanning, and similar services. Document projects involving third-party vendors are passed through at-cost. There are no administrative charges included in these figures.

4. The “document delivery” expense category includes things like postage and filing fees, but also charges from vendors that provide service of process. There are no administrative charges included in these figures.

5. The “document hosting” expense category is for charges incurred in hosting electronic documents. There are no administrative charges included in these figures.

6. The “legal research” expense category includes such charges as for WestLaw, Lexis-Nexis, and PACER, and print materials such as books. These charges reflect only out-of-pocket payments to the vendors for research done in connection with this action. Online research is billed based on actual time usage at a set charge by the vendor. There are no administrative charges included in these figures.

7. The “outside professional services” expense category is for experts and consultants.

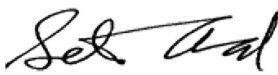
8. The “telephone, conference fees, etc.” category is for telephone services, primarily for charges in holding multi-party conference calls. These are amounts paid to third parties. There are no administrative charges included in these figures.

9. The final category is for “travel and meals.” These represent travel and meal expenses as governed by firm policies limiting reimbursements to ordinary and reasonable amounts.

* * *

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed April 15, 2025
New York, New York


Seth Ard